

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JUAN PACCHA,

Plaintiff,

- against -

APS ELECTRIC, INC., MIKHAIL
MIKHAYLOV,
and JANE DOE a/k/a GIANA,

Defendant.

Case No. 1:23-cv-2075 (NRM) (MMH)

**DECLARATION OF MICHAEL
TAUBENFELD IN OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS AND COMPEL
ARBITRATION**

I, MICHAEL TAUBENFELD, ESQ., the undersigned, affirm as follows under the penalties of perjury:

1. I am a partner in the firm of Fisher Taubenfeld LLP, counsel for the above-named Plaintiff. I am fully familiar with the facts set forth herein and respectfully submit this affirmation in support of Plaintiff's opposition to Defendants' motion to dismiss and compel arbitration.

2. Plaintiff filed his Complaint in this action on March 17, 2023 (DE 1).

3. Defendants allege that Plaintiff signed an arbitration agreement on June 6, 2017. Defendant's Exhibit C.

4. Plaintiff's counsel conducted research on arbitration costs, and hereby produce Exhibit 1 and Exhibit 2 as evidence regarding the costs of arbitration.

Dated: December 7, 2023
New York, NY

FISHER TAUBENFELD LLP

_____/s/_____
Michael Taubenfeld
225 Broadway, Suite 1700
New York, NY 10007
T: (212) 571-0700
F: (212) 505-2001
Attorneys for Plaintiff